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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
AT EUGENE

**TERRI KWAKE**, an individual and citizen of  
the State of Oregon,

Plaintiff,

v.

**SELECT PORTFOLIO SERVICING,  
INC.**, a Utah Corporation,

Defendants.

Civil No. 6:15-cv-1713

UNOPPOSED MOTION TO EXTEND  
DISCOVERY AND OTHER CASE  
DEADLINES

**LR 7-1 CERTIFICATE OF CONFERRAL**

Counsel for Plaintiff Terri Kwake hereby certifies that he and counsel  
for Defendant have conferred telephonically with regard to extending the  
deadlines currently set in this case and Defendant's counsel do not object to the  
filing of this motion.

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## MOTION

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LR 16.3, Plaintiff Terri Kwake respectfully request that this Court issue an order extending the discovery deadline to September 29, 2016.

This Motion is not filed for the purpose of delay and Plaintiff Terri Kwake believes that no party will be prejudiced by the granting of this Motion. Furthermore, the Plaintiff believes the following reasons are in favor of granting the motion:

1. The court has yet to rule on whether the documents provided to it for in camera review on August 17, 2016 should be produced to the Plaintiff.
2. The parties have yet to schedule or conduct depositions of each other. In particular, the Plaintiff was waiting until it had all the responsive documents from Defendant's litigation file before it scheduled the deposition of Defendant.
3. The parties have begun exploring settlement options with each other.

**DATED** August 29, 2016.

/s/Terry Scannell  
Terry Scannell (OSB #853220)  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2016, I electronically filed the foregoing document with the United States District Court using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the USDC CM/ECF system.

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DATED: September 2, 2016, 2016

/s/Terry Scannell  
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